



# THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA

333 John Carlyle Street, Suite 200 • Alexandria, VA 22314  
Phone: (703) 548-3118 • FAX: (703) 548-3119 • [www.agc.org](http://www.agc.org)

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March 28, 2003

Richard H. Karney, P.E., Manager  
ENERGY STAR Program  
U.S. Department of Energy  
1000 Independence Ave.  
Washington, D.C. 20585

Re: ENERGY STAR Windows Criteria Update

Dear Mr. Karney:

The Associated General Contractors (AGC) appreciates the opportunity to submit comments on the criteria for awarding the Energy Star to home replacement windows.

AGC's 32,000 members include general contractors, subcontractors, construction suppliers and service providers operating in every state in the country. We strongly believe that the adoption of the four-zone temperature map better represents the variations in temperature in all regions of the country. In addition, the four-zone map will continue to promote competition and innovation in manufacturing home replacement windows, whether or not they are hard coat or soft coat window producers. The government's goal should be to promote innovation and efficiency, and increase options to consumers.

Selection of the four-zone map also appears to be more in the spirit of energy efficiency. The Department of Energy's own analysis shows the four-zone alternative as the best in terms of overall national energy efficiency, providing significant savings over the three-zone option.

The overriding factor for our industry is providing the consumers with what they want. Window consumers who work with our members prefer both energy efficiency and options. We firmly believe that based on the information that we have highlighted, the four-zone option is the better choice. This option saves energy, saves money, and will continue to promote competition and innovation in manufacturing home replacement windows.

Thank you for providing AGC the opportunity to comment.

Sincerely,

Jeffrey D. Shoaf  
Senior Executive Director  
Government and Public Affairs